

Chapter 3

Ministry of Education

Section 3.11

School Safety

Background

A learning environment that is both physically and psychologically safe is essential for student success because inappropriate behaviour can adversely affect not only a student's safety but also his or her motivation to learn. The impact of bullying, for example, can be severe: victims often deal with such issues as social anxiety, loneliness, physical ailments, low self-esteem, absenteeism, diminished academic performance, depression, and, in extreme cases, suicide. An international study released in 2008 that compared 40 countries identified that Canadian students were generally bullied at a rate higher than the average and more than that of most developed countries. A 2009 survey of Ontario students in grades seven through 12 by the Centre for Addiction and Mental Health identified that almost one in three students has been bullied at school; approximately one-quarter of students have bullied others at school; 10% of students have assaulted someone; 7% have carried a weapon such as a knife or a gun; and 7% have been threatened or injured with a weapon on school property (Figure 1).

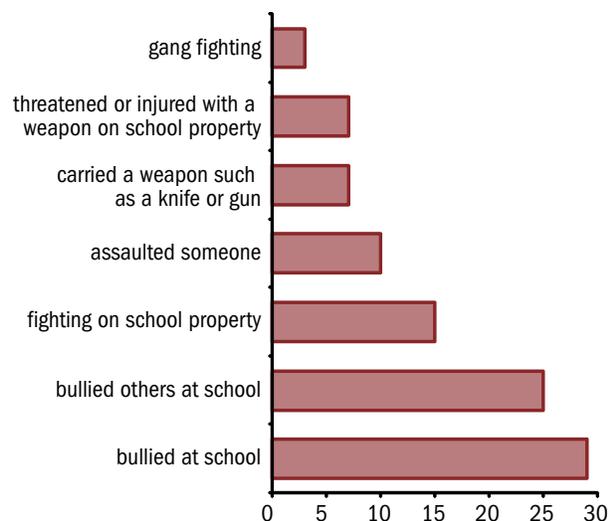
There are 72 publicly funded school boards in Ontario and approximately 4,900 schools serving about 2.1 million students. Education in Canada is a provincial responsibility; in Ontario, it is governed

principally by the *Education Act* and its regulations. This legislation sets out the duties and responsibilities of the Minister of Education, school boards, and school board staff.

The government has indicated that it is committed to improving publicly funded education and achieving positive outcomes for all students, and that it believes safe schools are a prerequisite for student success and academic achievement. Over the last three school years (2007/08–2009/10), the Ministry of Education has spent approximately \$50 million annually on school safety initiatives.

Figure 1: Percentage of Surveyed Ontario Students (Grades 7–12) Involved in Serious Incidents at School, 2009

Source of data: Centre for Addiction and Mental Health



Audit Objective and Scope

The objective of this audit was to assess whether the Ministry of Education (Ministry) and selected school boards had adequate procedures in place to:

- ensure compliance with school safety legislation and policy requirements;
- measure and report on the effectiveness of activities to improve the safety of Ontario's schools; and
- ensure that grants to school boards to improve school safety were spent as intended.

Our audit work was conducted at the Ministry's Safe Schools Unit, which holds the primary responsibility for school safety within the Ministry; at three Ontario school boards; and at selected elementary and secondary schools within each school board. The school boards we visited were the Durham District School Board, Sudbury Catholic District School Board, and Toronto District School Board.

In conducting our audit work, we reviewed relevant legislation, policies, and procedures, and met with appropriate staff of the Ministry and the school boards visited, including supervisory officers, principals, and teachers. We also researched other jurisdictions and engaged an adviser with expert knowledge on school safety issues. Our audit also included a review of related activities of the Ministry's Internal Audit Services Branch. We reviewed the Branch's recent reports and considered its work and any relevant issues identified when planning our work.

Summary

A number of initiatives have been taken over the last few years to address safety issues in Ontario's schools. These include the appointment of the Safe Schools Action Team (Team), comprising safety and education experts, which has been engaged on

three occasions to look at and provide recommendations on school safety issues, legislation, policies, and practices. The Team's recommendations have been a catalyst for new or significantly revised legislation and policies, training for thousands of school administrators and teachers, the development of communication materials for stakeholders, and increased funding to school boards to implement school safety programs and policies. However, neither the Ministry nor the school boards and schools we visited were collecting sufficient information on whether these initiatives are having an impact on student behaviour. Although the Ministry is in the process of hiring a consultant to develop performance indicators, without such information it is difficult to determine whether the millions of dollars being spent are reducing physical and psychological aggression in our schools.

Considerable efforts have been made to improve school safety, but a recent survey by the Centre for Addiction and Mental Health nonetheless identified that, although there had been a slight improvement over the previous five years, inappropriate behaviour is still prevalent among Ontario students. For example, 29% of students claim to be victims of bullying and 7% claim to have been threatened or injured with a weapon. Given these troubling statistics, it is vital that the government, Ministry, and school boards ensure that their efforts are effective in improving school safety. Better information on the success of its various initiatives would also help the Ministry to allocate funding to the areas of greatest need.

Some of our other key observations are as follows:

- The Ministry allocated \$34 million—about two-thirds of its total annual school safety funding—to two initiatives primarily focused on suspended, expelled, and other high-risk students. The majority of this funding was allocated based on total board enrolment rather than on more targeted factors such as the actual number of students needing assistance. The percentage of students that had

been suspended in each board ranged from 1% to more than 11% of the student population. As well, allocating the majority of funds based on total student enrolment might not be the best approach, given that some boards underspent their first-year allocation by as much as 70%.

- We visited a number of schools where police officers had been stationed and noted that the majority of school administrators indicated that having an officer in the school improved school safety and that expansion of such programs should be considered. We also noted that an evaluation undertaken of the program identified an improvement in relationships between students and police.
- Comparison of provincial and school board data on suspension rates to a recent anonymous provincial survey of students suggests that school administrators are not aware of the full extent of serious safety issues in some schools, such as the incidence of students being threatened or injured with a weapon. Most senior safety staff at the school boards we visited, as well as administrators at the schools we visited, told us that the discrepancy was due to a lack of reporting by students, possibly because of fear of reprisals, and that more needs to be done to facilitate student reporting of incidents.
- In addition to legislative requirements, the Ministry has established several policies on school safety that school boards and schools are responsible for complying with, including requirements pertaining to the application of progressive discipline for students who have repeatedly violated school safety policies. In 2007/08, the most recent school year for which the Ministry has published the data, suspension rates among school boards ranged from about 1% to 11% of the student population and varied even more significantly among the schools at the boards we visited (0%–25%). Neither the Ministry nor

the boards we visited had formally analyzed the differences among suspension rates of school boards to assess whether progressive discipline policies are being applied consistently across the province.

Detailed Audit Observations

SAFE SCHOOLS STRATEGY

In December 2004, the Minister of Education appointed a Safe Schools Action Team (Team) comprising safety and education experts and chaired by the then Parliamentary Assistant to the Minister of Education. Since then, the Minister has engaged the Team on three separate occasions to look at, report on, and provide recommendations on school safety issues. The government's and the Ministry's responses to these three reports have largely formed the basis of the Ministry's Safe Schools Strategy, which is founded on the premise that a safe and positive learning environment is essential for student success.

The Team produced three reports and the Ministry responded in three phases. School boards have responded accordingly with policy changes and new programming to address student behaviour issues. The Team's reports and some of the major initiatives associated with each of the Ministry's corresponding phases are as follows.

Shaping Safer Schools: A Bullying Prevention Action Plan, November 2005, advised on the development of a comprehensive, co-ordinated approach to bullying prevention in Ontario schools.

Phase 1:

- funded teacher and principal associations to provide bullying prevention and intervention training;
- provided almost \$8 million to school boards for the purchase of bullying prevention resources;

- developed a Bullying Prevention Registry that is posted on the Ministry's website to provide one-stop access to a range of school safety programs and resources;
- provided sample "school climate" surveys to identify school safety issues;
- entered into a multi-year partnership agreement with Kids Help Phone to expand the 24-hour hotline's ability to respond to calls and on-line questions from students; and
- published a pamphlet for parents to be used as a guide for dealing with bullying and its effects.

Safe Schools Policy and Practice: An Agenda for Action, June 2006, reviewed school safety legislation, regulations, policies, and practices.

Phase 2:

- amended the *Education Act*, effective February 1, 2008, to add bullying as an infraction for which principals must consider suspending a student and to require that school boards provide programs for students who have been expelled or who are serving long-term suspensions;
- issued new or significantly revised policies, including a provincial code of conduct and a policy on progressive discipline and promoting positive student behaviour; and
- provided approximately \$34 million annually to school boards, beginning with the 2007/08 school year, to implement academic and non-academic programs for expelled students and students serving long-term suspensions, and to hire professionals and paraprofessionals, such as psychologists and social workers.

Shaping a Culture of Respect in Our Schools: Promoting Safe and Healthy Relationships, December 2008, reviewed issues including gender-based violence, homophobia, sexual harassment, reporting requirements for school staff, and the removal of barriers to students reporting these types of behaviours.

Phase 3:

- further amended the *Education Act*, effective February 1, 2010, to require that school board staff report serious student incidents to the school principal and that principals contact the parents of students harmed in such incidents;
- revised policies to reflect legislative and other changes, such as a requirement that school staff who work directly with students respond to incidents that may have a negative impact on the school climate, such as racist, sexist, or homophobic slurs; and
- provided \$4 million to school boards to promote school safety, equity, and inclusive education, and to address harassment in schools.

In addition to the phases noted above and in response to recommendations from the Safe Schools Action Team, the Ministry has revised the elementary health and physical education curriculum to include sections on healthy relationships, equity, and inclusive education. These changes are scheduled to be implemented in the 2010/11 school year. The Ministry is also in the process of developing new courses at the secondary school level, such as gender studies, world cultures, and human dynamics.

SCHOOL SAFETY INITIATIVES

Over the three school years from 2007/08 through 2009/10, the Ministry allocated almost \$150 million to fund initiatives identified as supporting school safety. The Ministry's major initiatives and related funding are shown in Figure 2.

Programs for High-risk Students

On February 1, 2008, changes to the *Education Act* came into effect requiring that school boards put in place programs for expelled students and students serving long-term suspensions. In support of this new requirement, the Ministry has committed

Figure 2: School Safety Initiatives Funded by the Ministry of Education, 2007/08–2009/10 (\$ million)

Source of data: Ministry of Education

Initiative	2007/08	2008/09	2009/10	Total
programs for high-risk students:				
programs for expelled and suspended students	23.0	23.0	23.4	69.4
professional and paraprofessional staff	10.5	10.5	10.7	31.7
Urban and Priority High Schools	n/a	10.0	10.0	20.0
Student Support Leadership	3.0	3.0	3.0	9.0
Kids Help Phone	1.0	1.0	1.0	3.0
other initiatives	5.5	5.2	4.4	15.1
Total	43.0	52.7	52.5	148.2

approximately \$23 million annually to fund academic and non-academic programs for suspended and expelled students. These programs allow students the opportunity to continue their education and assist them in developing positive attitudes and behaviours. An additional amount—over \$10 million annually—has been provided to pay for the services of professionals and paraprofessionals, such as psychologists, social workers, and youth workers, who work with at-risk students as well as suspended and expelled students to help them reintegrate into the classroom and complete their education.

Together, the programs for expelled and suspended students and the funding for professionals and paraprofessionals account for about two-thirds of the Ministry's school safety funding. We noted that 20% of this funding was allocated based on demographic factors such as parental education and family unit composition, and an additional 20% was based on the geographic dispersion of schools. However, the majority (60%) of this funding was allocated based on the total number of students enrolled rather than more targeted factors, such as the number of suspended and expelled students needing assistance, which can vary significantly among boards. For example, suspension statistics provided by the Ministry for the 2007/08 school year (the most recent information available at the time of our audit) indicate that, for Ontario's 72 school boards, the rate of students being suspended at least once during the school year ranged

from less than 1% of elementary and secondary school students to more than 11%.

According to the terms of the agreements between the Ministry and the school boards, the boards were expected to provide a report for the 2007/08 school year—the first year of these initiatives—that would include how program funds had been spent. We reviewed a sample of reports from school boards for the 2007/08 year, which accounted for approximately half the funds allocated by the Ministry for these two initiatives, and discovered that several school boards reported that they had underspent their allocation by as much as 70%. This magnitude of underspending raises concerns about whether funding based primarily on student enrolment is the most appropriate allocation method, because some school boards may not have as great a need as others.

Given that this was the first year that school boards were required to provide programs for expelled students and students serving long-term suspensions, it is possible that some boards were not able to fully implement new programs in such a short period of time. Accordingly, the Ministry allowed the school boards to carry unspent funds to the following year. However, in the second year, funding was allocated through general school board funding of grants for student needs. The Ministry did not enter into specific agreements covering these programs, and the Ministry did not require that the boards report on their use of the program

funding. Furthermore, the Ministry did not restrict the use of program funds to the initiatives for which they were provided.

All three of the school boards we visited had established programs that provided academic and non-academic supports to expelled students and students serving lengthy suspensions. We also noted that, during the course of our audit, the Ministry sent a survey to school boards to obtain information about programs for such students. The survey requested information on staffing levels, student capacity, space allocation, types of supports offered, and board-established performance indicators. Prior to this survey, performance information obtained by the Ministry had been limited to the number of students who attended and completed such programs.

The Ministry had not collected information on the impact of these programs on school safety, such as whether there had been any subsequent improvements in student behaviour. We noted that only one of the three boards we visited tracked the subsequent behaviour of such students—although the tracking was limited to expelled students, not students serving lengthy suspensions, and for a period of only three months after the completion of the program. The Ministry indicated that it had expanded the capacity of its information system so that, starting with the 2009/10 school year, it would capture additional information on students in these programs, including whether students attended programs, whether they completed programs, and the types of non-academic programs students received, such as anger management or individual counselling. The Ministry indicated that the collection of these data will help it to assess whether students' behaviour has improved as a result of these programs.

Urban and Priority High Schools Initiative

Starting in the 2008/09 school year, the Ministry committed \$10 million annually to 34 schools in 12 school boards under its Urban and Priority

High Schools (UPHS) initiative. The purpose of this funding was to provide additional support for select secondary schools in urban neighbourhoods that face challenges such as poverty, criminal and gang activity, a lack of community resources, and below-average student achievement. According to the Ministry, schools use UPHS funding for a broad range of activities, including breakfast and lunch programs, extracurricular activities such as sports and music, and additional staffing, such as for social workers and child-and-youth workers. The Ministry's primary goals for this initiative were to improve school safety and academic achievement.

According to the terms of the program, the Ministry would provide funding based on applications for individual schools that included a school and community needs assessment and an action plan. We noted that the Ministry had identified many evaluation criteria, and these criteria were to be scored by a team of evaluators as "low," "moderate," or "high." However, since specific weighting was not assigned to each criterion, no overall ranking of schools could be made, and the selection process was not always clear. We also noted that the Ministry accepted applications on a one-time basis. Schools whose applications were approved would continue to receive funding in subsequent years without reapplying. The Ministry indicated that this program was designed to address needs that required long-term solutions and committed to a full review after five years.

In 2008/09, the Ministry provided \$3.5 million—more than one-third of all UPHS funding—to one school board, even though the Ministry did not receive any specific applications from individual schools in that board. In other words, the funding was allocated based on that board's overall need rather than on applications from individual schools, as was the case for other boards. Thus, schools in other school boards that had a demonstrated need or that submitted stronger action plans may have been denied funding. Although schools from this board subsequently provided the Ministry with applications for the 2009/10 school year, there

was no change in the overall amount of funding provided to this board.

Unlike its funding of programs for suspended and expelled students and funding for the services of professionals and paraprofessionals, the Ministry requires that schools report expenditures related to its UPHS initiative. Only one of the school boards we visited had received UPHS funding for 2008/09. Although this school board had provided the Ministry with information indicating that it had spent most of its 2008/09 allocation on staffing, including child-and-youth workers and safety monitors, it had not provided the Ministry—nor was it able to provide us—with specific details of the activities and the related costs at each school supported by this initiative.

Although the Ministry's intended outcomes for the UPHS initiative included improved school safety and student achievement, it did not set any specific goals, such as reducing the incidence of bullying by a target amount. The Ministry did request, however, that schools include in their applications measurable goals and performance indicators they would use to assess the effectiveness of their UPHS activities. Our review of a sample of approved applications identified that some schools focused their efforts on student achievement and thus did not develop goals and indicators directly related to school safety. For the schools that directed funding to improving school safety, we found that the goals and indicators developed were not sufficient in all cases to assess the effectiveness of school safety initiatives.

The Ministry had also developed reporting templates that schools were to use to identify baselines and set goals for Ministry-established performance indicators, which included such school safety indicators as the number of students suspended, the number of violent incidents, and the percentage of students who felt safe at school. Although such information is useful and the schools we reviewed generally provided it, many of these performance indicators were better suited to gauging the impact of an entire school's safety activities than the effect

of the specific activities funded under the UPHS initiative. We noted that in one U.S. jurisdiction, continued funding for programs for expelled and at-risk students was contingent on factors that included demonstrating measurable progress in meeting program objectives.

The Ministry's primary intention for the first year of the program as a whole was to set baseline data against which future years could be evaluated. At the time of our audit, the Ministry had just received reporting information from participating schools for the first year of the initiative and had yet to roll up the information to gauge, to the extent possible, the initial impact of this initiative on school safety. However, the information being collected may not be sufficiently reliable to assess progress. For example, the one school board we visited that had received UPHS funding did not submit applications for its schools for 2008/09, nor had these schools submitted the required year-end report to the Ministry detailing the progress of their initiatives. Furthermore, information obtained from a sample of schools from other boards identified cases where there was little information provided on the direct impact such activities had on school safety.

Student Support Leadership and Other Co-operative Initiatives

The Ministry has put in place policies encouraging boards and schools to work with community agencies and has partnered with the Ministry of Children and Youth Services to develop the Student Support Leadership initiative. The aim of this initiative is to build and enhance partnerships between school boards, schools, and community agencies to provide supports that promote positive student behaviour. Starting in the 2007/08 school year, the Ministry committed \$3 million annually for three years to clusters of neighbouring school boards and community agencies. Each cluster received a base amount of funding plus an additional amount based on various factors, such as student enrolment and community demographics.

We observed that, in response to the Student Support Leadership initiative, all three boards had undertaken activities that included working toward improving student access to community agencies, but the boards were unaware of how many students they referred to community agencies and had not assessed the effectiveness of such services in addressing student issues.

We noted that one of the school boards we visited had partnered with its local police service over the last two years to place police officers in over 30 of the board's secondary schools to build relationships and trust between students and police, and to improve student safety. Although the school board had not undertaken its own evaluation of this initiative, the local police service had conducted a survey at the start and end of the first year of this program. The survey included parents, teachers, school administrators, and students from the participating secondary schools. The police concluded that, overall, the initiative demonstrated a number of positive effects and has the potential to be increasingly beneficial in crime prevention, crime reporting, and relationship building. The survey results showed that, although improvements were not noted in all areas of school safety, some specific improvements included an increase in reporting by students who had been victims of crime; improved parental perception of school safety; decreased student concerns over being bullied; and improvements in student perceptions of the police. Also, at the end of the first year, about two-thirds of the students, three-quarters of the teachers, and 90% of the parents who responded to the survey indicated they felt that having a police officer in the school made their school safer.

We visited a number of schools in which police officers had been stationed and noted that the majority of administrators in these schools indicated that having an officer in the school improved school safety and that expansion of such programs should be considered.

Although the Student Support Leadership initiative demonstrates the Ministry's willingness to

partner with another ministry to promote positive student behaviour, we noted that it has not worked with school boards, other ministries, or community police services to explore the effectiveness of placing police officers in schools for the purpose of improving school safety.

RECOMMENDATION 1

To ensure that school safety funding is used effectively to achieve program goals to improve school safety, the Ministry of Education and, where appropriate, school boards should:

- reconsider the appropriateness of allocating, on the basis of enrolment, the majority of school safety funding primarily to assist suspended, expelled, and other high-risk students, given that the ratio of such students to total enrolment may vary significantly among school boards;
- for other specific program funding, ensure that the funds are allocated based on identified needs and follow up to verify that the funds provided are being spent for the intended purpose; and
- obtain and share information on the success of initiatives such as Student Support Leadership and police officer placements in schools, and determine whether a more significant co-ordinating role for the Ministry is appropriate to enhance their effectiveness.

MINISTRY RESPONSE

The Ministry is concerned about the health and safety of all students in Ontario, and the policies it puts in place need to be universally implemented; therefore, funding, training, and supports for policy initiatives must be made available to all boards.

The Ministry agrees that a review of the differences in suspension and expulsion rates within and among boards could provide insight into the extent to which such disciplinary

measures are being applied consistently and appropriately across the province. The Ministry is committed to conducting such a review, although this will be a multi-year process.

The current funding formula, based 60% on enrolment and 40% on other factors, ensures that funding and support for school safety programs is available to all boards and all students in Ontario. As a condition of receiving funding, the boards will be required to submit reports for all school safety programs on how the funds are spent. The Ministry will ensure that these reports contain sufficient detail to provide assurance that the funds have been spent for the purposes intended.

The Ministry's research on school safety will continue to be evidence-based, and the Ministry will gather and share information on the success of school safety initiatives. The Ministry encourages boards to form partnerships with police services and other community groups in order to support students, and it believes that decisions on how to address school needs through partnerships with police are best made at the school and community levels.

SUMMARY OF SCHOOL BOARDS' RESPONSES

All three school boards generally agreed with this recommendation. One school board indicated that providing funding based on identified student need rather than enrolment may improve assistance to high-risk students. The two other boards agreed that funding should be allocated on the basis of need, but one also noted that it was important to continue to fund ongoing programs whose successful implementation has led to improved school safety, and the third board cautioned that needs may be difficult to identify or predict. All three school boards also supported the sharing of promising practices. As well, school boards expressed

interest in continuing to explore and build upon police partnership models that work best for their communities, and share the impact that these models have on student safety.

MONITORING COMPLIANCE WITH SCHOOL SAFETY REQUIREMENTS

In response to the Safe Schools Action Team's recommendations, the government has revised the *Education Act* and the Ministry has introduced new or revised school safety policies. School boards and schools are responsible for complying with legislation and policies, such as the requirements that staff report serious incidents to the school principal; that principals consider mitigating factors in making disciplinary decisions; that school boards develop policies on bullying prevention and intervention and progressive discipline; that schools put in place a Safe School Team responsible for school safety; and that boards perform criminal background checks on employees and service providers.

We were informed that neither the Ministry nor the school boards we visited have established a formal monitoring function to ensure compliance with school safety requirements. At several of the school boards and schools we visited, some policies or parts of policies had not been updated or had not been updated before new requirements took effect. We also noted that each of the schools we visited either did not have a functioning Safe School Team or did not have representation on the team from all required stakeholders, such as parents and community partners.

As noted previously, the rate of suspensions at Ontario's 72 school boards ranged from 1% to more than 11% of student enrolment. Although we were told that the Ministry intends to review these differences, at the time of our audit, it had not done so. A review of these differences in suspension rates could provide insight into the extent to which such

disciplinary measures are being applied consistently and appropriately across the province.

At the school level, we found that the variation in suspension rates was even more pronounced. At all three boards we visited, the suspension rate for their schools ranged from 0% to over 25% of all students. None of the three boards had formally investigated whether such differences were reasonable or assessed whether disciplinary measures at their schools were being applied consistently and appropriately. It may be useful for boards to compare the rate of suspensions and expulsions to the number of incidents, which are required to be reported, for their schools to highlight disciplinary issues that might warrant further investigation.

According to the *Education Act* (Act), a principal's decisions on disciplinary action must take into consideration mitigating factors, such as whether the student has the ability to control his or her behaviour. Disciplinary measures are primarily at the discretion of each school principal. The Act defines behaviours for which a principal must suspend a student and those for which a principal must consider a suspension. The Act does not provide guidance as to the length of the suspension but prescribes that suspension can be between one and 20 days. The majority of senior safety staff at the school boards we visited and school administrators we interviewed noted that further guidance should be provided on the application of disciplinary measures to ensure greater consistency.

Although the Act identifies a number of behaviours that could lead to a suspension, such as drug possession, vandalism, or bullying, it allows school boards to define additional behaviours for which a principal must consider a suspension. We noted that all three school boards we visited added many other behaviours beyond those in the Act, such as fighting, swearing, sexual harassment, racial slurs, and smoking on school property. According to ministry data for the 2007/08 school year, more than 75% of incidents for which students were suspended were for board-defined activities. Although the Ministry's information system tracks the total number of such suspensions, it does not

do so according to the specific type of inappropriate behaviour; rather, all board-defined suspensions are coded as "Other." Thus, the ability to analyze this information in a meaningful way is limited. The majority of school administrators and some senior safety staff at the school boards we visited told us that the Ministry should have greater involvement in identifying the behaviours leading to suspension so as to foster greater system-wide consistency.

To protect the safety of students in Ontario, legislation requires that school boards obtain a criminal background check for employees and service providers who come into direct contact with students on a regular basis. After this initial check, school boards are required to obtain annually a declaration from all such individuals stating whether or not they have subsequently had any criminal convictions. All three of the school boards we visited had policies in place requiring that employees and service providers undergo criminal background checks and that employees provide an annual self-declaration thereafter. Because self-declarations may not be reliable, British Columbia requires an updated criminal background check every five years for those who work with students. Two of the three school boards we visited required updated criminal background checks from service providers every three years. In addition, all three boards had policies on criminal background checks for volunteers, but they did not require that these checks be periodically updated.

RECOMMENDATION 2

To promote compliance with all school safety legislation and policies designed to provide a safe learning environment for Ontario students, the Ministry of Education should work with school boards to:

- monitor compliance with required school safety legislation and ministry policies;
- ensure that schools have functioning Safe School Teams in place that include representation from all required groups;

- investigate significant differences in suspension rates between school boards and schools to assess whether such differences are reasonable and to determine whether additional student disciplinary guidance is necessary to ensure a reasonable level of consistency across the province; and
- assess whether requiring periodic updates to criminal background checks for school staff, service providers, and volunteers would enhance the safety of students in Ontario's schools.

MINISTRY RESPONSE

The Ministry is supporting enhanced governance and monitoring in the sector by providing \$5 million in the 2010/11 fiscal year to establish an internal audit capacity at school boards. The internal audit function will include a risk-assessment framework that includes the assessment of financial and operational compliance. Through this initiative, the Ministry will encourage boards to review school safety programs and services for compliance with related legislation, regulation, and policy. Also, school boards will establish audit committees to oversee the internal audit activities and help ensure overall financial and operational compliance.

The Ministry has reiterated to school boards their obligation to have at least one parent, one student (where appropriate), one teacher, one support staff member, one community partner, and the principal on their Safe School Teams. The Ministry is committed to working with school boards on an annual basis to assist them in ensuring that Safe School Teams have the appropriate members.

The Ministry is committed to increasing its analysis of the data it collects to assist in the development of policies and initiatives as well as in performance measurement. The Ministry also commits to sharing this analysis with school boards and anticipates that this analysis

will cause boards to reflect on their practices. In addition, although the Ministry recognizes that disciplinary decisions are made on a case-by-case basis, it intends to develop training materials on progressive discipline and mitigating factors to provide more consistency in practice across the province.

The Ministry is committed to discussing the issue of periodic updates to criminal background checks with its stakeholders and with police services.

SUMMARY OF SCHOOL BOARDS' RESPONSES

All three school boards agreed with this recommendation. One school board specifically commented that it would work with the Ministry to ensure that all schools comply with safety legislation and policies. Another board commented that, although it supported the recommendation, it may require a reassessment of resources to track compliance and monitoring issues. Two of the boards also indicated that they supported investigating significant differences in suspension rates and committed to working with the Ministry to analyze these differences. In addition, one of the boards commented that periodic updates to criminal background checks for its staff and volunteers could help to further support the board's safety goals, although it cautioned that such a change should be considered on a system-wide basis.

MEASURING AND REPORTING ON SCHOOL SAFETY

Objectives and Performance Indicators

Although the Ministry has taken action in response to the Safe Schools Action Team's recommendations to date, its efforts to evaluate the impact of these activities on the safety of students have been

limited. The Safe Schools Strategy is based on the premise that a safe and positive learning environment is essential for student success, yet the Ministry has not established measurable objectives for school safety, such as reducing the number of violent incidents or incidents of bullying by a specific number or percentage. Specific and measurable targets would facilitate the assessment of the effectiveness of its initiatives. Such evaluations are of critical importance not only to determine whether funds have been well spent but because studies indicate that some efforts to improve school safety can actually be counterproductive. For example, recent studies on bullying prevention programs highlighted that as many as 15% of the programs reviewed actually had negative effects on the rates of bullying and victimization.

Shortly after we completed our fieldwork, the Ministry issued a request for services to hire a consultant to develop appropriate performance indicators for its Safe Schools Strategy.

The Safe Schools Action Team specifically noted that having good underlying data informs decision-making and is critical in supporting best practices. The Team also noted that data should be used to monitor the school climate, evaluate current programs, focus resources on areas of need, and develop and implement new policies and programs. Although ministry policies require that school boards establish performance indicators to monitor, review, and evaluate the effectiveness of school safety policies and programs, in the three school boards we visited, we noted that efforts to evaluate the impact of these activities were generally limited to anecdotal feedback and informal review of suspension statistics. At the time of our audit, one of the three boards had just established measurable goals and performance indicators focused on student safety, but it had not yet measured any outcomes. Some of the schools we visited had set some measurable objectives, but measurable performance indicators were generally limited to reducing the overall rate of student suspension.

Analysis of School Safety Data

We observed that the Ministry and the school boards and schools we visited collect data related only to those school safety incidents that result in a suspension or expulsion. Yet many incidents that pose a concern for school safety may not necessarily result in disciplinary action as significant as suspension. For example, according to ministry data for the 2007/08 school year, less than 0.1% of students were suspended for bullying. In contrast, a recent survey of Ontario students in grades seven to 12 conducted by the Centre for Addiction and Mental Health indicated that 29% of students reported having been bullied at school and 25% of students reported having bullied others at school. Thus, suspension and expulsion statistics provide limited insight into the full extent of school safety issues. The majority of senior school board staff and school administrators we asked indicated that tracking the rates of incidents that do not result in suspension or expulsion would be useful in identifying and targeting problems and in evaluating existing programs.

With respect to suspension data, although ministry data suggest that the overall rate of suspension in the province has decreased, dropping from 7% of all elementary and secondary school students in the 2004/05 school year to 4.5% in 2007/08, the Ministry has not evaluated whether this change indicates that students are safer. At the three school boards we visited, although the frequency and level of detail of data generated regarding suspensions and expulsions varied by board, none of the boards had used the data to identify and target problem areas. Such data could be used to identify necessary policy and program changes. For example, if a high percentage of suspensions were for a specific infraction, the board could target this area of school safety for additional programming. Similarly, the use of such data at the school level was limited, although some schools indicated that they used this information to target students who are frequently in trouble, offering programs such as teacher–student mentoring.

Recording and analyzing complaints can also provide valuable insight into school safety issues. However, we noted that none of the school boards or schools we visited was analyzing complaints related to school safety. Such analysis could identify problem issues and areas where corrective or targeted actions should be taken.

Stakeholder Surveys

Surveys of stakeholders such as students, parents, and school staff can provide valuable data to be used in identifying significant safety issues and assessing progress made in addressing them. Starting with the release of the Team's first report in November 2005, schools have been encouraged to undertake "school climate" surveys to assess their safety. As of February 1, 2010, ministry policy requires that schools complete climate surveys every two years. However, the Ministry has not undertaken its own survey and has not collected survey data from school boards or schools to gauge the safety of Ontario schools at a province-wide level.

The use of surveys was also limited at the school boards we visited. For example, although two of the three boards had conducted surveys of students that included questions on school safety, only one of these boards had done so periodically so that it could benchmark its progress, and its surveys asked students only two questions pertaining to school safety: whether they felt safe at school, and whether they felt safe on their way to and from school. At the time of our audit, this board had drafted a more comprehensive survey aimed at students, which it intended to roll out in the near future. This draft survey contained various questions on school safety, including questions on bullying, sexual harassment, and homophobia. This board had also drafted a survey on bullying to be directed to parents.

None of the schools we visited could demonstrate that they had surveyed students with respect to school safety issues, although we noted that a student-led committee at one of the schools had

taken the initiative to conduct a survey. That survey resulted in the school planning to hold a number of activities devoted to safety, including safety-based games and an assembly featuring a guest speaker who was an authority on the subject.

Communication of School Safety Information and Incident Reporting

The Ministry has made an effort to ensure that the entire school community, including parents, students, and staff, are aware of relevant school safety legislation, policies, and resources. These efforts include posting the following on the ministry website: all three of the Team's reports; relevant policies, such as that on bullying prevention and intervention; fact sheets and guides for parents and others on topics such as bullying, progressive discipline, suspensions, expulsions, and recent legislative changes; and information on the availability and purpose of the Kids Help Phone confidential counselling service. The Ministry has also made many materials available to school boards and schools to disseminate to stakeholders; for example, it produced enough copies of a bullying guide written for parents for school boards and schools to distribute to all parents in the province.

Ministry policies also require that school boards communicate safe schools policies and procedures and other safe schools information to the school community, including parents, students, and staff. We noted that all of the school boards and schools we visited made efforts, to varying degrees, to communicate relevant school safety policies, procedures, and other information through means that included school board and school websites, student agendas, parent committees, school assemblies, newsletters, and other documents.

Despite the significant efforts that the Ministry, school boards, and schools have been taking to communicate about school safety and to facilitate better reporting of and response to serious student safety incidents, recent survey information and discussions with senior safety staff at school boards

and school administrators indicate that more needs to be done to encourage students to report serious school safety incidents to teachers and principals. The Centre for Addiction and Mental Health's (CAMH's) 2009 survey of Ontario students in grades seven to 12 suggests that the rate of serious school safety incidents may be significantly higher than the rate of suspension pertaining to such incidents. For example, the survey identified that about 7% of students reported having been threatened or injured with a weapon on school grounds, and approximately 7% of students identified having carried a weapon during the year preceding the survey. Such offences are generally automatic grounds for suspension and for considering expulsion. However, ministry data for the 2007/08 school year—the most recent available—showed that less than 1% of Ontario students were suspended or expelled for such incidents.

All senior safety staff at the three school boards we visited and almost all school administrators we spoke with felt that the difference between the rate of suspension for such serious incidents and the level of incidence identified in the CAMH survey is primarily due to a lack of reporting of such incidents by students. They suggested a number of ways to address this issue, including ensuring that students can report anonymously because many students do not report out of fear of retaliation; ensuring that students feel that action will be taken if they report an incident; facilitating greater parental involvement to increase reporting; and providing additional training to educators in order to facilitate greater trust between teachers and students.

RECOMMENDATION 3

To help in its efforts to ensure that students are educated in a safe environment, the Ministry of Education should work with school boards to:

- develop measurable objectives and related performance indicators for activities intended to improve school safety, and periodically

measure progress in achieving these objectives;

- capture data on incidents of inappropriate student behaviour and complaints received, in addition to the information currently collected on suspensions and expulsions, to support the assessment of existing initiatives and identify areas on which to focus future efforts;
- conduct school safety surveys to gauge the progress achieved in improving school safety at the provincial and school board levels; and
- review existing best practices in Ontario and elsewhere that have been found to be effective in encouraging students to report serious school safety incidents.

MINISTRY RESPONSE

The Ministry has contracted with an organization to provide it with expert advice on developing a comprehensive evaluation framework to measure the success of its Safe Schools Strategy and is committed to evaluating the strategy when it has an evaluation framework in place. In addition, as a result of the evaluation framework, the Ministry will have provincial measures and indicators for safe schools and, commencing with the 2009/10 school year, the Ministry is collecting data on the effectiveness of programs for suspended and expelled students.

The Ministry agrees that additional data are required to measure the success of the Safe Schools Strategy at the board and school level, and is committed to working with boards to capture these data. The Ministry requires schools to conduct anonymous school climate surveys of their students every two years. These surveys must include questions on bullying and harassment related to homophobia, gender-based violence, and sexual harassment. The Ministry expects school boards to assess how this tool can best be used to assist principals in creating local

solutions that address the specific needs of their respective populations.

The Ministry will continue to review existing practices in Ontario and elsewhere that are found to be effective in encouraging students to report serious school safety incidents and will share these practices with the boards.

SUMMARY OF SCHOOL BOARDS' RESPONSES

All three school boards generally agreed with the recommendation. One of the boards indicated that further insight may be gained if additional information on incidents of inappropriate student behaviour were collected. Another board commented that capturing additional data is worthwhile and important. However, two of the boards also cautioned that capturing and analyzing additional data would be challenging, and committed to working with the Ministry on how to best capture this data within available resources. In addition, one board commented that sharing effective practices used in Ontario with school boards would be helpful.

SCHOOL SAFETY TRAINING

The Ministry advised us that, in response to recommendations in the Team's three reports, it had provided or funded training on school safety issues for tens of thousands of administrators and teachers on topics such as bullying prevention and intervention, as well as on legislative and policy changes. Training has been directed primarily to Ontario's approximately 115,000 public school teachers and 7,000 principals and vice-principals. However, neither the Ministry nor the school boards we visited had formal procedures in place to ensure that sufficient training was provided to all teachers and school administrators. For example:

- In response to the Team's first report, the Ministry provided funding to principal and

teacher associations to deliver bullying prevention and intervention training to most principals and vice-principals and to approximately 17,500 teachers. Although the Team noted that teachers and staff at each school need the necessary skills to identify, respond to, and prevent bullying incidents, neither the Ministry nor the school boards we visited had reliable information on the teachers and staff who had received this training since that time.

- Following the Team's second and third reports, the government introduced changes to legislation and the Ministry made significant policy changes, including changes addressing issues such as gender-based violence, homophobia, sexual harassment, reporting requirements for school staff, and how to reduce barriers to student reporting of inappropriate behaviours. To ensure appropriate implementation of the changes arising from the second report, the Ministry provided funding to the Council of Ontario Directors of Education to deliver training to principals, vice-principals, supervisory officers, and other small groups from each school board. According to the Ministry, almost 9,000 individuals received training through this initiative. Following the third report, the Ministry provided training to three representatives from each school board and provided funding to school boards to train three representatives from each school. However, in both cases, the Ministry was not aware of how many additional school board staff had subsequently received training, nor did the school boards we visited track the number of additional staff trained. The schools we visited indicated that they had provided training and that all teachers were required to attend, but we noted that the depth and method of training varied, ranging from short staff meetings to the topic being covered during professional development days.
- Although teachers can receive training on school safety issues, none of the school boards

we visited had mandated ongoing school safety training. In addition, although all three school boards had an induction program for new teachers, only one of the boards required that new teachers take courses that included at least some instruction on school safety.

The majority of school board staff, school principals, and vice-principals we interviewed felt that school safety training for teachers could be improved. Suggestions included additional mandated training for all teachers; additional training for new teachers and prospective teachers attending faculties of education; and greater prioritization of school safety training by both the Ministry and school boards.

RECOMMENDATION 4

To build on the steps taken to date to ensure that school staff are adequately trained to deal with school safety issues, the Ministry of Education should work with school boards to assess whether school safety training delegated to schools is of sufficient depth to meet the needs of school staff.

MINISTRY RESPONSE

The Ministry has recently requested, as a minimum, that boards dedicate time at professional activity days to school safety issues, paying

particular attention to the needs of new staff and occasional teachers. The Ministry has used a train-the-trainer model to train board staff on new safe schools legislation and policy, because this approach was determined to be the most efficient method for delivering large-scale training with limited resources. The Ministry has also provided funding and other resources to boards to subsequently train principals, teachers, and other staff. In addition, the Ministry has made available resources on safe schools through Building Futures, a workshop for teacher candidates, and through the New Teacher Induction Program to new teachers employed in publicly funded schools.

SUMMARY OF SCHOOL BOARDS' RESPONSES

All three school boards agreed with the recommendation. One of the school boards indicated that school safety training should be in-depth and ongoing, and also noted that in an effort to improve staff training it was now in the process of revising its training practices and its tracking of employee training. This board also indicated that it would appreciate working with the Ministry to determine the most effective models, within available resources, to train staff.